

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KAZI MANAGEMENT	:	Civil Action No. 4:20-cv-00924
SAINT CROIX, LLC and ZUBAIR	:	
KAZI,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
SANTIAGO GARCIA GUTIERREZ,	:	JURY TRIAL DEMANDED
UNIVERSAL INVESTMENTS &	:	
TRADING, LLC, and UNITED FUEL	:	
SUPPLY SA, LLC, and JOHN DOE,	:	
Defendants		

MOTION FOR DEFAULT JUDGMENT

Comes Now, Plaintiffs, Kazi Management Saint Croix, LLC and Zubair Kazi, by and through counsel, Forest Dean Morgan, Esquire, and files this Motion for Judgement by Default against the defendants, Santiago Garcia Gutierrez, Universal Investments & Trading, LLC, and United Fuel Supply SA, LLC and avers as follows:

1. A Complaint was filed on March 13, 2020.
2. Defendants were properly served with Notice pursuant to the Federal Rules of Civil Procedure and Order of this Court.
3. Defendants failed to plead or defend and a Default was entered on September 8, 2020.
4. The attached affidavit and supporting exhibits set forth that Notice was proper and that Plaintiffs are entitled to judgment in an amount certain of \$2,739,789.27.
5. Prejudgment interest in the amount of \$70,183.64 has accrued since the date the Complaint was filed based upon the annual judgment rate of 5.0%. *See*

International Turbine v. VASP Brazilian Airlines, 278 F.3rd 494 (5th Cir. 2002);
Sec. 304.003, Tex. Fin. Code.

WHEREFORE, Plaintiffs respectfully request this Court enter Judgment in Default in favor of the Plaintiffs in the amount of two million eight hundred nine thousand nine hundred seventy-two dollars and ninety-one cents (**\$2,809,972.91**).

Respectfully Submitted,

/s/ Forest Dean Morgan
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